

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
(OCA/USPS-9)
(July 16, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and a request for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

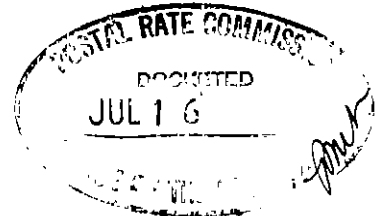
Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

David Ruderman

DAVID RUDERMAN
Attorney



OCA/USPS-9. The following interrogatory refers to USPS witness Landwehr's testimony at 7 and witness Needham's testimony at 8 (USPS-T-7). Given that witness Needham's testimony states,

Box customers and post office employees work together to determine the appropriate size box for customers' needs. Customers may request or be requested to move to a larger size box if their current box is too small to handle the volume of mail received.

- a. Please explain why non-resident box holders whose mail volumes may exceed the capacity of boxes and thus place an administrative burden on a given post office are not requested to move to an appropriately sized box.
- b. Given that no costs are available to substantiate the difference in attributable costs associated with providing box service to residents versus non-residents, please explain how the anticipated non-resident fee will adequately compensate the Postal Service for the "administrative burdens" placed upon the Postal Service by those patrons renting undersized post office boxes? (See USPS witness Lion's response to OCA/USPS-T4-1)
- c. Please explain why the Postal Service believes that a non-resident fee is a better solution to Postal Service boxholder capacity problems than is a requirement that a customer rent an adequately sized post office box?

- d. Please provide all available data, studies or other analysis performed on the actual workload difference required to service resident versus non-resident box holders.
- e. Please provide all available data, studies or other analyses performed to identify the frequency with which residents and non-residents rent undersized post office boxes.
- f. For those residents and/or non-residents who rent undersized post office boxes, please provide all available data, studies or other analyses explaining the Postal Service's rationale for (1) not reassigning the boxholder to an adequately sized box, and/or (2) assessing the boxholder the fee for an adequately sized box.
- g. For those residents and/or non-residents who rent undersized post office boxes, please provide all available data, studies or other analyses explaining why box customers and post office employees are unable to "work together to determine the appropriate size box for [the] customers' needs."

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.



DAVID RUDERMAN
Attorney

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